

LAW OFFICE OF  
ZACHARY MARGULIS-OHNUMA

June 30, 2020

Via ECF

Hon. Victor Marrero  
U.S. District Judge  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

USDC SDNY  
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RE: U.S. v. Figallo, 18 Cr. 684 (VM)

Dear Judge Marrero:

This office represents the defendant, Kenyatta Taiste, in the above-captioned case. I write to request a modification of Ms. Taiste's conditions of release to remove the electronic monitoring requirement. The government and pretrial do not object to this request.

On October 2, 2018, Ms. Taiste was arraigned on an indictment alleging one count of conspiracy to distribute narcotics under 21 U.S.C. §§ 841(b)(1)(A) and 846. On February 28, 2019, Ms. Taiste appeared before U.S. Magistrate Judge Stewart D. Aaron for a detention hearing. Judge Aaron ordered her detained. Ms. Taiste appealed that decision to this Court, and on March 8, 2019, bail appeal was granted. See Bail Appeal Letter, March 7, 2019. Although Ms. Taiste was originally released to home detention, on July 18, 2019 -- after several months of compliance with the release conditions -- the home-confinement requirement was modified to a curfew enforced via electronic monitoring. Ms. Taiste has remained compliant with her release conditions.

On March 9, 2020, Ms. Taiste filed a sealed motion for a modification of her release conditions to remove the electronic monitoring requirement. At that time, the government indicated that it opposed the removal of the monitor and pretrial took no position on the request. Now, almost four months later, the government informed our office that it no longer objects to the removal of the electronic monitoring requirement, as long as Ms.

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Taiste is still subject to strict supervision by pretrial. Ms. Taiste agrees to this condition.

Therefore, given the government's withdrawal of its initial opposition, Ms. Taiste respectfully requests that her motion to modify her conditions of release to remove the electronic monitoring requirement be granted.

Thank you for your attention to this case.

Very truly yours,

*Victoria Nicole Medley*

Victoria Nicole Medley

CC: All counsel of record (via email)  
Pretrial Services Officer Carlos Ramirez (via email)

The request for modification of Kenyatta Taiste's conditions of release to remove the electronic monitoring requirement is granted.

**SO ORDERED.**

June 30, 2020

DATE



VICTOR MARRERO, U.S.D.J.